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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S STATEMENT OF ARCANE-
RELATED EXPANSION AND
CONTINUING IP INFRINGEMENT

Dated this: April 21, 2025

M. WOLSTENHOLME.
[MARC WOLSTENHOLME]

TO THE HONORABLE COURT:

I. Introduction

Plaintiff submits this statement to detail Riot Games' ongoing and expanding monetization of Arcane-related intellectual property (IP), which continues to infringe upon Plaintiff's rights. Despite misleading public narratives suggesting limited profitability, Riot has systematically leveraged Arcane across various platforms and products, generating substantial revenue and reinforcing the need for comprehensive discovery and appropriate remedies.

II. Riot's Monetization Strategies and Revenue Streams

A. High-End In-Game Cosmetics

Riot has introduced premium Arcane-themed in-game cosmetics within League of Legends, employing gacha-style mechanics that encourage repeated purchases. Notably, certain skins have been priced up to \$250, with acquisition chances tied to randomized systems, leading to potential expenditures exceeding \$400 for a single item.

B. Merchandise Collaborations and Sales

Riot has expanded Arcane's presence through various merchandise collaborations:

- Fenty Beauty x Arcane: A limited-edition makeup collection priced at \$250.
- UNIQLO UT Collection: Apparel featuring Arcane characters.
- BlackMilk Clothing: Fashion items inspired by Arcane.
- Heroes & Villains: Lifestyle gear and accessories themed around Arcane.

1 - Amazon and Redbubble: Arcane-inspired merchandise like posters and
2 collectibles.

3 - Ambessa: Chosen of the Wolf – A League of Legends: Arcane novel.

4 - The Art and Making of Arcane Book by Elisabeth Vincentelli.

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7 C. Home Media Releases

8 GKIDS has produced and distributed Arcane Season 1 in various formats:

9 - 4K UHD Steelbook Edition: \$59.98 with exclusive designs and content.

10 - Blu-ray Editions: Standard and Collector's Editions (\$34.96–\$150).

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13 D. Licensing Agreements

14 Riot secured licensing deals for Arcane's distribution:

15 - Netflix: \$3 million per episode.

16 - Tencent: \$3 million per episode.

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19 **III. Implications for Plaintiff's Claims**

20 The extensive commercialization of Arcane underscores the ongoing exploitation
21 of Plaintiff's IP. Riot's strategic partnerships, high-priced in-game items, and diverse
22 merchandise offerings demonstrate a concerted effort to monetize the Arcane brand beyond the
23 original scope, thereby exacerbating the infringement and necessitating a reevaluation of
24 damages and remedies. Moreover, Arcane acted as a promotional tool to an aging brand and it
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1 also fleshed out characters from cardboard to what they are now, which has allowed Riot to
2 expand into many other industries, perhaps saving the company in the long run.

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5 **IV. Request for Relief**

6 - Expanded Discovery: To uncover the full extent of revenues from Arcane-
7 related products and collaborations.

8 - Injunctive Relief: To prevent further unauthorized use and commercialization of
9 Plaintiff's IP.

10 - Accounting and Damages: A comprehensive accounting of profits from Arcane,
11 with appropriate compensation.
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Appendix A – List of Arcane-Related Products, Media, and Collaborations

I. In-Game Content

- League of Legends – Arcane Skins: Jinx, Vi, Caitlyn, Jayce, etc.
- League of Legends – Characters: Mel Medarda, Ambessa Medarda, etc.
- League of Legends – Arcane-themed in-game events and missions, etc.
- Teamfight Tactics – Arcane-themed sets, Little Legends, Arena cosmetics.
- Legends of Runeterra – Arcane characters, event cards.
- Project K, new card game.
- VALORANT – Arcane Collector's Set (weapons, cards, sprays).
- 2XKO – Upcoming fighting game using Arcane-inspired narrative tone.
- Cannon lore infused into all Riot Games products.
- Backstories of all key characters derived from Bloodborg.

II. Cinematics and Narrative Spin-Offs

- Welcome to Noxus (2025 Cinematic) – Expanding Arcane into Noxian storyline.
- Blood, Sweat & Tears (Music Video) – Origin of Mel & Ambessa.
- Noxus Series – Continuation of Mel Medarda's arc.
- Ionia Series – Mystical storylines and expansion.
- Demacia Series – Magic, honor, and political themes.

III. Merchandise and Commercial Collaborations

- Fenty Beauty x Arcane: A limited-edition makeup collection priced at \$250.
- UNIQLO UT Collection: Apparel featuring Arcane characters.
- BlackMilk Clothing: Fashion items inspired by Arcane.
- Heroes & Villains: Lifestyle gear and accessories themed around Arcane.
- Amazon and Redbubble: Arcane-inspired merchandise like posters and collectibles.
- Ambessa: Chosen of the Wolf – A League of Legends: Arcane novel.

IV. Licensing and Streaming Deals

- Netflix – \$3 million per episode
- Tencent – \$3 million per episode

V. Riot Development Projects Enabled by Arcane

- 2XKO (Project L) – Narrative design from Arcane.
- Vietnam-Based Live Action Film – Centered on Mel and other Arcane lore.
- New Animation Studios – Built due to Arcane's success.
- Retconning of League of Legends lore to align with Arcane.
- Multi-billion-dollar new projects greenlit off Arcane metrics.

VI. Economic Impact Summary

- Combined production/marketing cost: ~\$250 million (estimated).
- Netflix & Tencent licensing revenue: ~\$108 million.
- Undisclosed in-game monetization profits (Arcane skins, loot systems).
- Profits from live events, merchandise, cross-promotional sales.
- Arcane's success elevated Riot to narrative animation industry leader.
- Expansion into film, TV, and lifestyle sectors likely saved Riot long-term.

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made
are true and accurate

Executed on April 21, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

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